

EXHIBIT B

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ELIZABETH HELMINSKI,

Plaintiff,

v

GENTEX CORPORATION, BRIAN
BRACKENBURY, personally and
individually,

Defendants.

Case No. 1:21-cv-000340

HON. JANET T. NEFF

DECLARATION OF ZOE MARTINEZ

I, Zoe Martinez, state that I have personal knowledge of the facts contained in this Declaration and if called to testify would state:

1. I am employed by Defendant Gentex Corporation (“**Gentex**”) as Senior Legal Counsel.

2. Gentex’s employee handbook (“**Handbook**”) describes Vacation and Short Term Income Protection. Plaintiff Elizabeth Helminski utilized both of these benefits during her nine-month employment at Gentex. Excerpts from the Handbook, including excerpts related to Vacation and Short Term Income Protection, are attached as Exhibit B-1. Company records from Gentex’s human resources information system related to Ms. Helminski’s use of Vacation and Short-Term Income Protection are attached as Exhibit B-2.

3. Pursuant to Gentex’s Travel, Expense, and Entertainment Policy, Ms. Helminski also submitted business expenses for reimbursement online. The Travel, Expense, and Entertainment Policy is referenced in the Handbook, and both this policy and a link to the

reimbursement website are available on the Gentex Intranet. Excerpts from the Handbook related to the Travel, Expense and Entertainment Policy are included in Exhibit B-1. Company records related to Ms. Helminski's submission of business expenses are attached as Exhibit B-3.

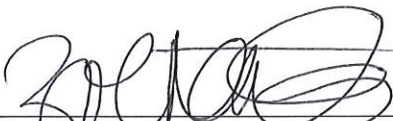
4. After Ms. Helminski's employment with Gentex ended on September 30, 2019, Ms. Helminski filed a charge with the Michigan Department of Civil Rights ("**MDCR**") and Equal Employment Opportunity Commission ("**EEOC**") against Gentex, but not her supervisor, Defendant Brian Brackenbury. Ms. Helminski's administrative charges are attached as Exhibit B-4.

5. As indicated in the Handbook, Gentex makes its Alternative Dispute Resolution Policy ("**ADR Policy**") available to all employees on the Gentex Intranet or from Human Resources. Excerpts from the Handbook related to the ADR Policy are included in Exhibit B-1. The ADR Policy available as of January 3, 2019, is attached as Exhibit B-5. Ms. Helminski signed an acknowledgement of this ADR Policy and the Handbook ("**Acknowledgment**").

6. On January 11, 2019, Gentex changed the ADR Policy that was available to all employees on the Gentex Intranet or from Human Resources. Ms. Helminski did not subsequently sign any separate acknowledgment of the ADR Policy available on or after January 11, 2019. The ADR Policy available on and after January 11, 2019, is attached as Exhibit B-6.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 12, 2021.



Zoe Martinez